

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 00-6258-CR-FERGUSON

UNITED STATES OF AMERICA,)
Plaintiff,)

vs.

LIDIA RAMOS,)
Defendant.)

**EMERGENCY MOTION FOR ONE DAY MODIFICATION OF
PRE-TRIAL CURFEW**

Defendant, LIDIA RAMOS, moves this court for the entry of an order modifying for one day her pre-trial curfew. In support of this motion Defendant states as follows:

1. Defendant was granted bond and placed on pre-trial supervision with a curfew from 12:00 a.m. until 6:00 a.m.
2. Defendant has complied with all the pre-trial supervision requirements since the time of her release.
3. Defendant and her family have the tradition of assisting midnight mass on every 31st of December.
4. Defendant has requested permission from her Pre-Trial Officer, Gavin Churchill, who indicated to Defendant that he would need a court order.
5. Defendant would be attending mass at La Iglesia Cristiana, La Gran Comision, located at 709 SE 1st Avenue, Hollandale, Florida 33009.
Tel: (954) 458-1130.

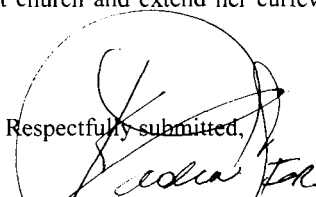
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6. Defendant expects to be back at her house by 1:45 a.m. on January 1, 2000.

WHEREFORE, Defendant respectfully prays to this Honorable for the entry of an order allowing her to assist church and extend her curfew until 1:45 a.m.

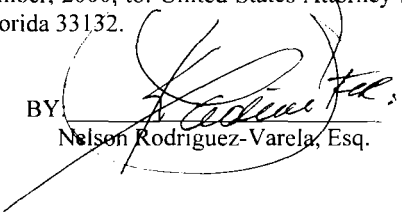
Respectfully submitted,


Nelson Rodriguez-Varela, Esq.
Counsel for Defendant
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Tel: (305) 261-4000
Fax: (305) 662-8715
Fl. Bar No.: 876739

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 27th day of December, 2000, to: United States Attorney's Office, 99 NE 4th Street, Miami, Florida 33132.

BY:


Nelson Rodriguez-Varela, Esq.